

**SEWARD & KISSEL LLP**

One Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 574-1200  
John R. Ashmead, Esq.  
Mark D. Kotwick, Esq.  
Catherine V. LoTempio, Esq.

*Special Litigation Counsel to the  
Official Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**CERTIFICATE OF NO OBJECTION FOR FIRST INTERIM FEE APPLICATION OF  
SEWARD & KISSEL LLP, SPECIAL LITIGATION COUNSEL FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR  
THE PERIOD FROM MARCH 30, 2023 THROUGH MAY 31, 2023**

**PLEASE TAKE NOTICE** that, on September 6, 2023, Seward & Kissel LLP (“S&K”) filed the *First Interim Application of Seward & Kissel LLP, Special Litigation Counsel to the Official Committee of Unsecured Creditors, for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period March 30, 2023 Through May 31, 2023* [Dkt. No. 684] (the “Application”). On September 26, 2023, S&K filed a notice of hearing on the Application setting the hearing for October 24, 2023 (the “Hearing Notice”). The Application was served on September 6, 2023 and the Hearing Notice was served on September 26, 2023, proof of

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

service for which was filed on September 26, 2023 [Dkt. No. 740]. The deadline for filing a response to the Application was October 17, 2023 at 4:00 p.m. (ET) (the “Response Deadline”).

**PLEASE TAKE FURTHER NOTICE** that the Response Deadline has passed, and the undersigned hereby certifies to the best of his knowledge that no objection, responsive pleading, or informal response has been filed or served with respect to the Application.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York, this certificate is being filed at least forty-eight (48) hours after expiration of the deadline for parties to file and serve any answer, objection, or response to the Application.

**PLEASE TAKE FURTHER NOTICE** that, based upon the foregoing, S&K respectfully requests entry of an order, substantially in the form of the Proposed Order attached hereto as Exhibit A and submitted contemporaneously herewith to Chambers, and that the Application be considered resolved and S&K’s need to appear be relieved for purposes of the hearing currently scheduled for October 24, 2023 at 11:00 a.m. (ET) given the lack of objections received.

Dated: October 19, 2023  
New York, New York

Respectfully submitted,

By: /s/ John R. Ashmead

**SEWARD & KISSEL LLP**

John R. Ashmead  
Mark D. Kotwick  
Catherine V. LoTempio  
One Battery Park Plaza  
New York, NY 10004  
Telephone: (212) 574-1200  
E-mail: ashmead@sewxis.com  
kotwick@sewxis.com  
lotempio@sewxis.com

*Special Litigation Counsel to the  
Official Committee of Unsecured Creditors*

**Exhibit A**  
**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER GRANTING FIRST INTERIM FEE APPLICATION OF SEWARD & KISSEL LLP, SPECIAL LITIGATION COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM MARCH 30, 2023 THROUGH MAY 31, 2023**

Upon consideration of the *First Interim Application of Seward & Kissel LLP, Special Litigation Counsel for the Official Committee of Unsecured Creditors, for Compensation for Services Rendered and Reimbursement of Expenses Incurred for the Period from March 30, 2023 through May 31, 2023* [Dkt. No. 684] (the “Application”); and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and (c)(2); and no responses thereto having been filed or received; and sufficient cause having been shown therefor, it is hereby;

**ORDERED** that the Application is granted as set forth in the attached **Schedule A**.

Dated: October\_\_\_\_\_, 2023  
White Plains, New York

THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

Case No.: 23-10063

Case Name: In re Genesis Global Holdco, LLC

**INTERIM FEE PERIOD**

March 30, 2023 – May 31, 2023

**Schedule A**

Applicant	Date/Docket Number of Application	Interim Fees Requested on Application	Fees Allowed	Fees to be Paid for Interim Fee Period (80% of Fees Allowed)	Fees to be Paid for Prior Fee Period(s)	Total Fees to be Paid	Interim Expenses Requested	Expenses to be Paid for Current Fee Period
Seward & Kissel LLP	September 6, 2023, ECF No. 684	\$111,247.50	\$111,247.50	\$88,998.00	N/A	\$88,998.00	\$1,854.36	\$1,854.36